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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CAVE CONSULTING GROUP, INC.,

Plaintiff,

vs.

OPTUMINSIGHT, INC,

Defendant.

Case No. 3:15-cv-03424-JCS

**REVISED JOINT PROPOSED
SCHEDULE FOR RESOLUTION OF
PRIVILEGE AND WORK PRODUCT
ISSUES**

Judge: Hon. Joseph C. Spero

The parties to this action jointly submit this REVISED JOINT PROPOSED SCHEDULE FOR THE RESOLUTION OF PRIVILEGE AND WORK PRODUCT ISSUES. This document supplements the Joint Proposed Schedule for Resolution of Privilege and Work Product Issues filed April 8, 2016 (ECF No. 81).

In the initial Joint Proposed Schedule, the parties submitted competing schedules for document production and resolution of privilege and work product issues. Counsel for the parties have conferred, and have agreed to a modified schedule described below:

On or before <u>April 29, 2016</u>:	Any party seeking production of information claimed to be Privileged shall identify (a) the categories of documents sought and (b) the scope of any Privilege log it seeks. - COMPLETED
On or before <u>May 13, 2016</u>:	The recipient of the April 29 submission shall provide notice of areas of agreement or disagreement as to such submission. - COMPLETED
On or before <u>June 15, 2016</u>:	The parties shall submit a joint disclosure that identifies any areas of final disagreement regarding the topics and materials sought to be produced and logged, and a brief statement of each party's position supported by relevant authority.
<u>July 8, 2016</u>: <i>(date of next case status conference)</i>	Court hears argument and resolves areas of disagreement regarding scope of materials for which privilege logs must be produced
On or before <u>July 15, 2016</u>:	The parties shall complete production and logging of all information as agreed by the parties and ordered by the Court. OptumInsight reserves the right to request an extension to this deadline for the review, production and privilege logs for (1) documents from one prior law firm from which OptumInsight has not yet received any documents, despite ongoing efforts to collect those documents; and (2) any broader scope of documents the Court orders OptumInsight to review, log and produce at or after the July 8, 2016 status conference. CCGroup reserves the right to oppose any request for extension of the deadline.

On or before <u>July 22, 2016</u>:	If necessary, the parties shall meet and confer in person regarding any unresolved issues concerning the other's production and/or privilege logs.
No later than <u>July 29, 2016</u>:	Either party seeking production of information withheld on grounds of privilege or work product shall file a motion to compel.
No later than <u>August 12, 2016</u>, but no later than two weeks after the moving brief has been filed:	Any Response in opposition to motion to compel is due.
No later than <u>August 18, 2016</u>:	Any Reply in support of motion to compel is due.
<u>September 2, 2016</u> at 9:30 AM	Proposed date of hearing for argument on motions to compel
<u>September 30, 2016</u>	Mediation

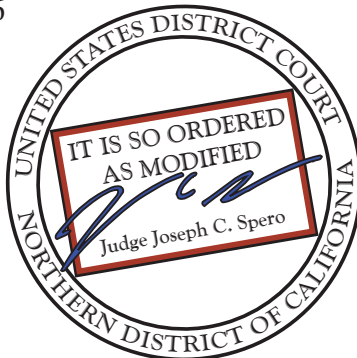
Dated: June 9, 2016

/s/ Zachary C. Howenstine
 Zachary C. Howenstine
 Counsel for Cave Consulting Group, Inc.

Dated: June 9, 2016

/s/ Shannon L. Bjorklund (w/ permission)
 Shannon L. Bjorklund
 Counsel for OptumInsight, Inc.

Dated: 6/10/16



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CIVIL L.R. 5-1(i)(3) CERTIFICATION

The undersigned filer of this document hereby certifies that concurrence in the filing of this document has been obtained from the other signatory.

/s/ Zachary C. Howenstine